

5. At all times material hereto, Defendant acted by and through its authorized agents, servants, workers and/or employees, acting in the course and scope of their employment with Defendant and in furtherance of Defendant's business.

6. Plaintiff, at the time of his termination of employment by Defendant, was 58 years of age.

7. In October of 2014 Plaintiff filed a complaint of age and discrimination and retaliation against Defendant with the Pennsylvania Human Relations Commission ("PHRC"), with said complaint being dual-filed with the Equal Employment Opportunity Commission ("EEOC").

8. Plaintiff was hired by Defendant on or about January 31, 2005, and last held the position of Manager of Product Quality & Performance.

9. A significant part of Plaintiff's job duties as the Manager of Product Quality & Performance including travelling to Europe to deal with Defendant's European clients.

10. On or about September 4, 2014 there was a meeting between Don Neville, Director of RA for Europe, Drew Richards, "CEO," and Bruce Calvert, the Director of Research & Development and Plaintiff's immediate supervisor, to discuss an upcoming business trip to visit a client in Poland.

11. After the meeting, Plaintiff asked Mr. Neville if he was going on the trip to Poland, and Neville said, "no, you're not going to believe this, but they're sending Ralph." Mr. Neville was referring to Ralph Creneti, a Research Chemist who was in his early 40s

12. Mr. Creneti's job duties did not include making trips to Europe to visit and service clients, something he had never done, and he also had not been involved in handling any European accounts.

13. After hearing from Mr. Neville that Mr. Creneti was going on the trip, Plaintiff spoke to Mr. Calvert about Creneti being sent to Poland instead of him, and he was told that he "was skating on